



**BellSouth Telecommunications, Inc.**

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REGULATORY AUTH.

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EXECUTIVE SECRETARY

May 14, 2001

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

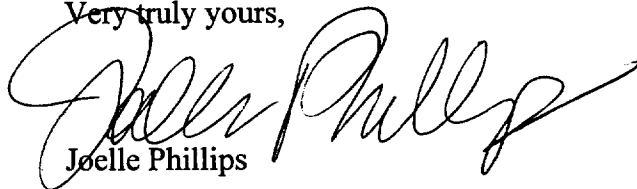
Re: *Universal Service Fund*  
Docket No. 97-00888

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Comments Concerning the Issue of Whether the Authority May Request Revenue Information from and, Ultimately, Require Contribution to the Universal Fund by Commercial Mobile Radio Service ("CMRS") Providers.

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Joelle Phillips

JP/jej

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

**In Re:**           *Universal Service Generic Contested Case*

**Docket No. 97-00888**

**BELLSOUTH TELECOMMUNICATIONS, INC.'S COMMENTS**  
**CONCERNING THE ISSUE OF WHETHER THE AUTHORITY**  
**MAY REQUEST REVENUE INFORMATION FROM AND,**  
**ULTIMATELY, REQUIRE CONTRIBUTION TO THE**  
**UNIVERSAL SERVICE FUND BY**  
**COMMERCIAL MOBILE RADIO SERVICE ("CMRS") PROVIDERS**

BellSouth Telecommunications, Inc. ("BellSouth") files the following comments concerning the issue of whether the Tennessee Regulatory Authority (the "Authority") may request revenue information from and, ultimately, require contribution to the Universal Service Fund by Commercial Mobile Radio Service ("CMRS") providers.

In its Interim Order on Phase I of Universal Service, the Authority ordered that "all providers of intrastate telecommunications services in Tennessee, regulated or not, shall be required to contribute to the intrastate Universal Service Fund." BellSouth respectfully urges that the ruling was well-founded and should not be altered.

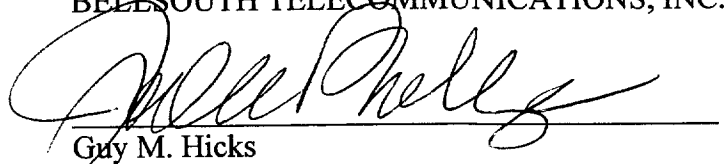
Pursuant to 47 U.S.C. §254(b)(4), all telecommunications carriers should contribute to the preservation and advancement of Universal Service. Wireless providers have sought to avoid contributing both at the state and federal level, but, for the most part, wireless providers have been unsuccessful. Wireless telecommunications providers are subject to assessment for payment into the federal USF program. Similarly, wireless providers should also be subject to payment into any intrastate USF program.

The collection of revenue data from CMRS providers poses no unusual problems. The collection of such data would be similar to collecting assessment-base information from these

carriers to compute other types of mandatory payments, such as state income or ad valorem taxes. CMRS providers are required to submit revenue information to the FCC, including a breakdown of total revenues and interstate/international revenues (the difference between the total revenue and the interstate/international revenue equals the intrastate revenues). This same information could be used for the Tennessee USF program. Telecommunications carriers including BellSouth, do not currently submit this data at the state level, but the information should be readily available or easily assembled. Telecommunications carriers could submit such information in the same format or a similar format with little additional burden, using revenue sources already defined for purposes of FCC Form 499.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks

Joelle Phillips

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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, fax, or U. S. Mail, postage pre-paid, addressed as follows:

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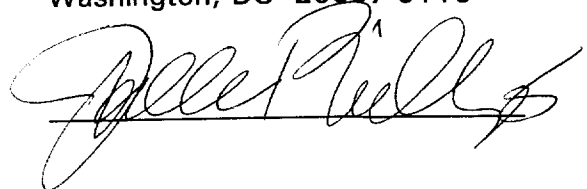
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